BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS
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IN THE MATTER OF POSSIBLE MODIFICATIONS TO THE COMMISSION'S ENERGY RULES

DOCKET NO. RU-00000A-18-0284

COMMENTS OF WESTERN RESOURCE ADVOCATES AND WESTERN GRID GROUP

Western Resource Advocates and Western Grid Group appreciate the opportunity to comment on the Commission's inquiry into the Renewable Energy Standard and Tariff (REST) rules.

Summary of Comments

The Arizona Corporation Commission showed early leadership on clean energy, enacting the Environmental Portfolio Standard (EPS) in 1998.[1] In 2006, the Commission recognized the need to update the EPS, and established Arizona's REST rules.[2] Since 2006, the REST has driven valuable investment in clean, renewable energy – TEP and APS now have nearly 1,100 MW of utility-scale wind and solar on their systems, in addition to almost 1,200 MW of customer-sited distributed generation (DG).[3] The Commission adopted the EPS and REST standards because the Commission determined that adding renewable energy to the resource mix of regulated utilities was in the public interest. The benefits included diversification of energy resources to serve load, support for customer self-determination, water savings and other environmental benefits, and modernization of the electric system.

Since the last revision of the REST rules, however, the economics of wind and solar energy have fundamentally shifted from being resources with costs above fossil generation to being well below the cost of many fossil resources. This paradigm shift creates a new imperative for the Commission's consideration of a renewable energy requirement. If wind and solar are now the lowest cost options for the electric system, then utilities would presumably prioritize procurement of clean resources over more expensive fossil gas resources. We suggest that this may not be the case, based on recent utility procurement activity. We recommend that the Commission update and increase the REST to ensure utilities are procuring least cost, clean energy resources for customers.

[1] Decision 61071 (Aug. 1998).
[2] Decision 69127 (Nov. 2006).
[3] TEP, 2018. Application of Tucson Electric Power Company for Approval of its 2019 Renewable Energy Standard Implementation Plan.
APS, 2018. Application of Arizona Public Service Company for Approval of its 2019 Renewable Energy Standard Implementation for Reset of Renewable Energy Adjustor.

We commend Commissioners Tobin and Kennedy for recognizing the need to again update and expand Arizona's REST. With key changes, the REST rules will continue to provide important policy direction to utilities in the State of Arizona. We recommend the Commission:

- Adopt a new requirement that by 2045, Arizona utilities meet 100% of their retail sales with zero-carbon energy sources; and
- Increase the renewable energy requirement to at least 50% of retail sales.

Over the long term, we believe the zero-carbon requirement will send a critical market signal to industry to develop new low- and zero-carbon generating technologies. These technologies will be essential for ensuring a low-cost, successful transition to a zero-carbon electric sector.

In the near term, the best way to expand low-cost, zero-carbon resources in Arizona is to increase the renewable energy requirement. The 50% renewable energy target is technologically feasible and will ensure Arizona utility customers see the cost, public health, and environmental benefits of renewable resources; however, we believe additional analyses can inform the timing of the requirement. Recognizing that key resource decisions will be made in the 2030 – 2035 time frame,[4] we encourage the Commission to evaluate the impact of requiring utilities to meet a 50% RES in 2028, 2030, or 2035. In addition to the 50% renewable energy and 100% zero carbon targets, the Commission should adopt interim renewable and zero-carbon energy requirements to ensure that utilities make steady progress to meeting the renewable energy and the zero-carbon energy targets.

We recommend several additional changes to the REST rules that can address key policy issues. For example, Arizona utilities are expected to close several coal plants over the next six years, including Navajo Generating Station (NGS) at the end of 2019 and Cholla Generating Station in 2025. The plant closures will free up transmission resources that can be used to access remote wind or solar resources, which could help diversify utilities' renewable resource mix. Additionally, when these plants close, utilities – and the Commission – can play an important role in ensuring an economic transition for the affected communities. Therefore, we recommend the Commission add a new provision to the REST that provides a preference for clean energy resources developed in communities affected by coal closures. Finally, we recommend changes to the DG requirement and eligible DG resources.

In order to modernize the electric system, the Commission and utilities must commit to doing so. The REST ensures that utilities commit to incremental additions of renewable energy, a key component of a clean, modern electric system. We encourage the Commission to commence a robust stakeholder process to expand and modernize the REST rules. Specifically, we recommend the Commission continue the current REST stakeholder workshops with the end goal of developing a draft rule based on stakeholder input. At the conclusion of that process, we recommend the Commission open a formal rulemaking. We look forward to working with the Commission and stakeholders on this issue going forward.

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[4] For example, the Four Corners coal plant's coal contract expires in 2031, and the utility owners – except for APS – have announced plans to exit the plant at that point in time. Four Corners is an inflexible resource, but once it retires, utilities may be able to more readily integrate higher levels of renewables and storage.

In the following section, we address Commission staff's key questions, including

1. The necessity of the REST rules;
2. The relation between the REST rules and other rules, including the IRP rules; and
3. Recommended changes to the rules.

Comments on Staff Questions

1. The REST rules are necessary for driving clean energy investments in Arizona.

The REST provides important policy direction for utilities. By expanding and modernizing the REST, the Commission will ensure Arizona customers see the cost and environmental benefits of clean energy resources. Renewable energy standards and, increasingly, zero-carbon electricity standards, provide key benefits, such as:

- Increasing investment in the lowest costs energy resources available;
- Encouraging utilities to learn how to operate and integrate higher levels of renewables;
- Driving utilities, businesses, and entrepreneurs to develop new technologies, business models, and mechanisms to integrate higher levels of renewable energy;
- Ensuring Arizonans benefit from the cost, public health, and environmental benefits of renewables;
- Driving innovation in the private sector to develop new low- and zero-carbon technologies, which will be essential for achieving a low- or zero-carbon electricity sector by mid-century;
- Making sure utilities do not make short-sighted investments in fossil resources that may appear cheaper in the short term, but are at risk of becoming stranded assets over the long term,[5] as the cost of clean energy resources declines and customer demand rises; and
- Diversifying the electric generation mix, in order to manage the risk of volatile fuel prices and impacts on customers.

The Since 2006, the REST has resulted in expansive benefits for Arizonans. We estimate that the renewable energy acquired by the two largest affected utilities, APS and TEP, has saved over 13 billion gallons of water and avoided over 26 million short tons of CO_2 emissions.[6] Increasing the REST will continue to drive these important benefits in addition to valuable ratepayer benefits. The price of renewable energy has fallen significantly in recent years: according to Lazard, the cost of wind fell 69% over the last nine years (from 2009 to 2018); the cost of solar PV fell 88% over that same period;[7] and battery costs have fallen, and are expected to continue declining.[8] In recent competitive utility bidding processes in Colorado,[9] New

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[5] For example, a number of natural gas plants in California have been shuttered recently, including plants that have been built as recently as 2003. *See* https://www.elp.com/articles/2018/03/nrg-to-close-several-gas-power-plants-in-california.html.

[6] Calculations assume renewables displace energy generated at a mix of coal and natural gas plants.

[7] Costs reflect the levelized cost of energy, and do not reflect any federal tax credits. Source: Lazard, 2018. Lazard's Levelized Cost of Energy Analysis—Version 12.0, available at https://www.lazard.com/media/450784/lazards-levelized-cost-of-energy-version-120-vfinal.pdf.

[8] Lazard, 2018. Lazard's Levelized Cost of Storage Analysis—Version 4.0, available at https://www.lazard.com/media/450774/lazards-levelized-cost-of-storage-version-40-vfinal.pdf.

[9] Public Service Company of Colorado estimates it will save customers $215 million (NPV) by replacing 725 MW of coal-fired resources with 1,800 MW of renewables and 275 MW of battery storage (2016 Electric Resource Plan, 120-Day Report, Public Version. Proceeding No.16A-0396E).

Mexico, and Nevada,[10] utilities found that investing in new solar and wind facilities reduces customer costs, compared to existing fossil fuel resources. For example, in its proposal to acquire 1,200 MW of wind energy in New Mexico and Texas, the President of Southwestern Public Service Company (SPS) stated that "SPS has an opportunity to save our customers approximately $2.8 billion in customer cost savings over the next three decades by acquiring, developing, and owning wind energy resources..."[11]

Expanding renewable energy would have similar consumer benefits in Arizona. In our modeling in the 2017 Integrated Resource Plan (IRP) proceeding, Western Resource Advocates, Western Grid Group, and 14 other organizations submitted analyses showing that a portfolio of clean energy resources, including renewable energy, demand side management, and battery storage was *cheaper* than APS's and TEP's proposed resource portfolios, which relied heavily on natural gas.[12] The clean resource portfolios reduced APS's and TEP's revenue requirements by $275 million and $268 million, respectively, in addition to reducing the portfolios' water use and air emissions. In the portfolios modeled, approximately 40% of energy demands in 2030 are met with renewable resources (including DG). Importantly, the analysis indicated that utilities could reliably meet peak demands, ramping requirements,[13] and reserve margins.

Despite their low cost, Arizona utilities have modest plans to acquire renewables. In its 2017 IRP, APS proposed to procure no new renewable energy and included just one utility-scale renewable resource, a contract extension for a 90 MW wind facility, while including over 5,500 MW of new gas capacity.[14] TEP's IRP included plans to add nearly 800 MW of wind and solar over the 15-year period, which would exceed the REST requirement and meet 30% of their customers' load with renewables. Arizona should adopt more robust renewable energy and clean energy targets to ensure utilities procure these resources; failing to do so threatens to cost Arizona businesses and customers more than necessary.

The financial benefits of adoption of clean resources and the feasibility of doing has been recognized by other states. States across the western region have adopted much more aggressive renewable energy standards (Figure 1). Utilities in the region have established similarly ambitious goals. For example,

- New Mexico and California have adopted renewable energy standards of 50% and 60% by 2030, respectively, and a 100% zero-carbon requirement by 2045. Public Service Company of New Mexico (PNM) has stated that 70% of its energy will be from zero-carbon sources by 2031.[15] Of note, PNM supported the legislative package increasing the renewable energy standard.
- Nevada voters passed a ballot initiative in 2018 increasing Nevada's RPS to 50% by 2030, and the Nevada legislature is now considering establishing a 50% RPS by 2030, with a 100% zero-carbon goal by 2050. NV Energy supports the increased renewable energy standard. Additionally, the Nevada PUC

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[10] NV Energy, 2018. Nevada Power Company and Sierra Pacific Power Company, Joint 2019 – 2038 Integrated Resource Plan. Docket No. 18-06003.

[11] Testimony from David Hudson, President of Southwestern Public Service Company, on its proposal to acquire 1,200 MW of wind in New Mexico and Texas. Case No. 17-00044-UT.

[12] The comments were filed by the Joint Stakeholders in Docket No. E-00000V-15-0094, In the Matter of Resource Planning and Procurement in 2015 and 2016.

[13] The analysis modeled the ability of the portfolio of clean energy resources to meet TEP's 10-minute ramping needs and APS's 3-hour ramping needs.

[14] APS's IRP included 3,200 MW of customer-sited distributed generation; however, APS has not been acquiring all the renewable energy credits associated with distributed resources since 2013. *See* Decisions 73636 (Jan. 2013) and 74365 (Feb. 2014).

[15] See, e.g. http://www.pnmresources.com/about-us/sustainability-portal/climate-change-report.aspx.

approved NV Energy's proposal to acquire 1,001 MW of solar and 100 MW of battery storage, resources that were acquired based on their ability to *lower customer costs* and reduce customers' exposure to natural gas prices.[16]

- By 2026, Xcel Energy in Colorado will meet 55% of energy demands with renewables. Xcel will displace *existing* fossil-fueled resources with renewable energy because *it saves their customers money*.[17] In addition, Xcel Energy – operating across eight states – announced plans to reduce its carbon emissions 80% below 2005 levels by 2030, and be 100% carbon free by 2050.[18]

New Mexico's renewable energy standard, which was recently increased,[19] is a useful benchmark. Two New Mexico utilities, PNM and El Paso Electric Company (EPE), own shares of the Palo Verde nuclear plant; Palo Verde meets approximately 30% of their energy needs. Those utilities did not oppose New Mexico's proposed 50% RPS, and while their loads may differ from Arizona utilities, it indicates that achieving high levels of renewable energy is not inconsistent with maintaining Palo Verde.

Increasing the REST could drive valuable consumer benefits, water savings, public health, and environmental benefits. The REST rules are essential for ensuring that Arizona utilities continue to make the transition to a more modern, clean energy system. Through them, the Commission can ensure that Arizona customers see the same cost and public health benefits that ratepayers in neighboring states are seeing.

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[16] NV Energy, 2018. Nevada Power Company and Sierra Pacific Power Company, Joint 2019 – 2038 Integrated Resource Plan. Docket No. 18-06003. Volume 4.

[17] Xcel Energy, 2018. Colorado Energy Plan update, available at https://www.xcelenergy.com/staticfiles/xe-responsive/Company/Rates%20&%20Regulations/Resource%20Plans/CO-Energy-Plan-Fact-Sheet.pdf.

[18] Xcel Energy, 2019. Building a Carbon-free Future, available at https://www.xcelenergy.com/staticfiles/xe/PDF/Xcel%20Energy%20Carbon%20Report%20-%20Feb%202019.pdf.

[19] The New Mexico RPS was increased in New Mexico Senate Bill 489, signed into law on March 22, 2019. The bill draft is available at https://www.nmlegis.gov/Legislation/Legislation?Chamber=S&LegType=B&LegNo=489&year=19.

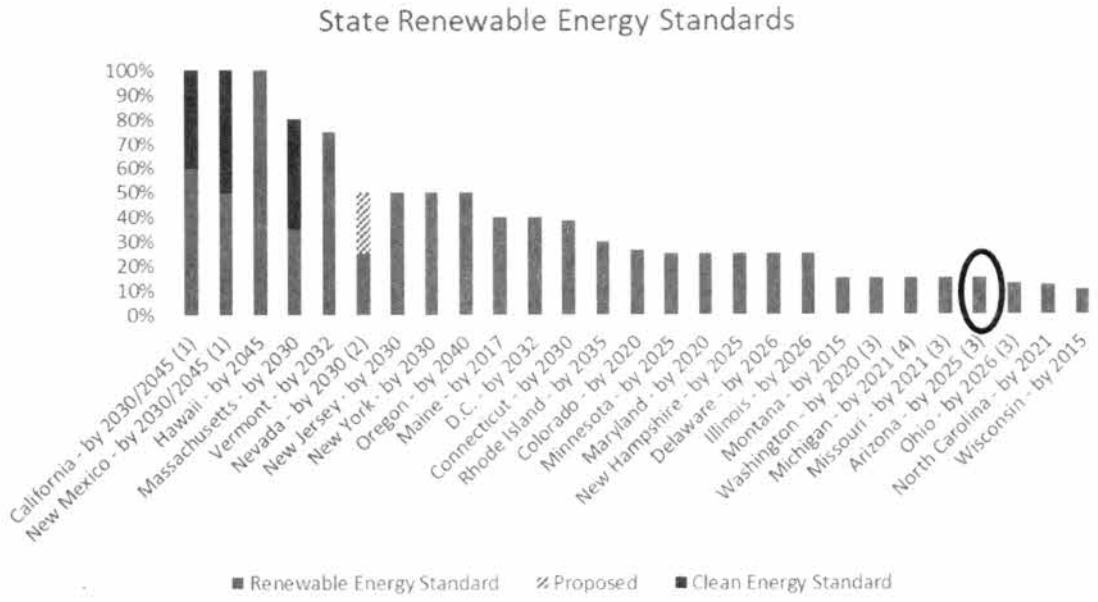

Figure 1. A comparison of renewable energy standards across US states. Source: Database of State Incentives for Renewables & Efficiency, available at http://www.dsireusa.org/ Notes:

(1) The clean standard is by 2045

(2) Voters approved a measure increasing the RPS to 50% in 2030; the legislature is currently considering legislation that would enact that target.

(3) Applies only to IOUs

(4) The IOUs will meet a 50% "clean" standard by 2030, where clean includes RE and EE.

2. The REST rules are the appropriate venue to determine renewable energy investments, and should not be combined with other Commission rules.

We oppose merging the REST and IRP rules because the rules serve different purposes. When the Commission adopted the current REST rules in Decision 69127, the purpose was to drive the adoption of renewable energy in Arizona and to reduce the state's reliance on fossil fuels. In that Decision, the Commission made the specific finding of fact that:

> Continued reliance on fossil fuel generation resources without the addition of renewable generation resources is inadequate and insufficient to promote and safeguard the security, convenience, health and safety of the Affected Utilities' customers and the public in Arizona, and is therefore unjust, unreasonable, unsafe, and improper.[20]

The REST rules provide the commitment of the state to renewables and set the energy policy. Increasing the amount of electricity provided from renewable resources is in the public interest "to reduce air pollution emissions and their associated external costs and to promote and safeguard the security, convenience, health and safety of Affected Utilities' customers and the public in Arizona."[21] The REST rules specifically induce utilities to improve their capabilities to modernize Arizona's electric system. To meet

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[20] Decision No. 69127, p.55.

[21] *Id.*

the requirements defined in the REST rules, utilities and the Commission necessarily focus on developing new capabilities.

The purpose of the IRP rules, on the other hand, is the exploration of options, risk management, forecasting, and modeling. IRPs are essentially utilities' plans to meet the future electric service needs of their customers, resulting in schedules of supply-side and demand-side resources to provide the continued, reliable delivery of electricity to their customers. The IRP process does not set Commission policy, but instead serves as a yardstick to gauge the utilities' ability to meet their obligations to the customers they serve and compliance with the Commission's policies imposed by other rules, such as the REST. While the IRP rules could certainly be improved, those changes should be made subsequent to the revision of the REST rules.

3. Recommended changes to the REST rules.

We recommend several key changes to the REST rules, in order for Arizona ratepayers to see the key benefits of renewable energy and clean energy.

3.1. We recommend the Commission amend the REST rules to require utilities to meet 100% of energy demands with zero-carbon electricity by 2045.

The zero-carbon electricity standard aligns with Commissioner Tobin's proposal for utilities to meet 80% of their retail sales with clean energy in 2050. However, we propose to increase the stringency of that goal, in order to ensure utilities reduce carbon pollution consistent with science-based targets.

Recent reports indicate that, in order to reduce carbon pollution economy wide, electric utilities will need to be fully decarbonized by mid-century.[22] Utilities can make significant near-term progress toward that goal by increasing the renewable energy standard; however, to cost-effectively achieve 100% decarbonization, scientists also project that utilities will need to tap a broader suite of zero-carbon technologies.[23] Adopting a 100% zero carbon requirement ensures that utilities, businesses, and entrepreneurs are incentivized to develop new technologies, such as carbon capture and storage paired with fossil generators, or systems that can store energy over an extended period of time. The zero-carbon standard is technology neutral, which means that utilities can utilize the most cost-effective zero-carbon energy sources to meet their needs, whether that is new renewables, maintaining existing nuclear facilities, or developing other technologies.

To enact this change, we recommend the Commission create a new section establishing the zero-carbon requirement and defining an accounting mechanism to ensure utilities are achieving the standard. Commissioner Tobin's proposed Clean Renewable Energy Standard and Tariff offers one potential definition of a facility that could earn zero-emission credits: "an energy resource that operates with zero net emissions beyond that of steam." An alternative strategy is to define zero-emission credits based on

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[22] IPCC, 2018: Summary for Policymakers. In: Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty.

[23] *See, e.g.*, http://energy.mit.edu/news/study-adding-power-choices-reduces-cost-and-risk-of-carbon-free-electricity/ Blogpost summarizes the findings in Sepulveda, N., J. Jenkins, F. de Sisternes, and R. Lester, 2018. The Role of Firm Low-Carbon Electricity Resources in Deep Decarbonization of Power Generation, *Joule*, Volume 2, Issue 11.

the emission profile of the generator, where a facility that generates 1 MWh of energy and emits no pollution earns 1 zero-emission credit, and facilities that emit low levels of pollution (e.g., a fossil-fuel plant with partial carbon capture and storage) are eligible to earn partial credits, based on their emissions profile.

In addition to establishing a zero-carbon requirement for 2045, we encourage the Commission to establish interim targets, such as 60% zero-carbon resources by 2035 and 80% zero-carbon resources by 2040.[24] There may be additional questions about implementing the zero-carbon target, such as what accounting mechanism the Commission uses to measure compliance with the standard. For example, should the Commission establish "zero-emission credits," similar to renewable energy credits (RECs)? Are those credits bankable? We look forward to working with the Commission and stakeholders on these issues in subsequent workshops.

3.2. The renewable energy requirement should be increased to 50% based on the outcome of an economic analysis, and interim targets should be adopted.

We recommend the Commission develop additional analyses around the timing of the requirement. At a minimum, the Commission should require utilities to meet a 50% RES by 2035 and should establish interim renewable energy requirements of 30% in 2025 and 40% in 2030. However, we encourage the Commission to evaluate whether utilities can cost-effectively achieve the 50% RES goal by an earlier date (e.g., 2028, as Commissioner Kennedy has proposed). If the Commission's analysis supports the earlier date, the Commission should require utilities to meet 50% of retail sales with renewables by 2028, and should establish interim requirements, such as 30% renewable energy by 2023 and 40% renewable energy by 2026.

To enact these changes, we recommend the Commission revise A.A.C. R14-2-1804 to reflect the higher percentages.

3.3. The REST should be amended to include a preference for renewable resources developed in or near communities where coal plants have closed, or are expected to close.

Several coal plants are expected to close in the next 15 years, including Navajo Generating Station (NGS) at the end of 2019 (in which both APS and TEP have ownership shares); San Juan Generating Station in 2022 (TEP); and Cholla Generating Station in 2025 (APS). In addition, TEP plans to exit the Four Corners Power Plant in 2031; we think it is reasonable that the other utility owners will also exit then,[25] which could result in the plant closure at that time. Arizona utilities have transmission access to these plants in proportion to their ownership. Utilizing that transmission to access remote wind and solar resources could help diversify the utilities' renewable resource portfolios and balance solar resources in central Arizona. We expect that this diversification will be important for cost-effectively achieving higher levels of renewable penetration in this state.

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[24] APS reported in April 2017 that its resource mix was 50% is carbon free. "APS's current energy mix is carbon-free (25 percent nuclear, 13 percent energy efficiency, 12 percent renewables)". Thus, if a 60% zero-carbon resource standard was adopted in 2019 the utility would have 16 years to change its resource mix by just 10% and over two decades to reach the 80% goal. https://www.aps.com/en/ourcompany/news/latestnews/Pages/aps-takes-big-picture-look-at-arizona-energy-future-in-15-year-forecast.aspx

[25] PNM plans to leave the plant in 2031, and SRP will have fully depreciated its costs associated with Four Corners, so could reasonably be expected to exit the plant as well.

When the coal plants close, the local communities could see devastating economic impacts as a result of job losses and reduced property tax revenues. Siting new, renewable generation in or near the impacted communities could help mitigate these economic impacts. We encourage the Commission to amend the REST rules to include a preference for renewable energy sited in or near communities affected by coal closures. For example, the Commission could require that the utilities' REST filings include a discussion of the type and scale of projects proposed near affected coal communities, and reasons why those projects were selected or rejected. For reference, the New Mexico legislature adopted language directing utilities to prefer projects that create economic development opportunities in communities affected by a coal plant closure:

> As part of that competitive procurement ... projects shall be ranked based on their cost, economic development opportunity and ability to provide jobs with comparable pay and benefits to those lost due to the abandonment of a qualifying generating facility. The qualitative and quantitative data and analysis used to establish the ranking shall be available for review by parties to the commission proceeding.[26]

3.4. The Commission should amend the DG requirements in the REST.

Distributed generation can provide important benefits. It allows customers to develop clean energy on their property, which may reduce the transmission and distribution costs associated with clean energy. It also enables customer choice, and supports a participation in the clean energy marketplace by a broader set of entities. The DG carve out was effective at spurring robust development of distributed solar. In part this was due to incentives provided. However, as incentives are no longer necessary or provided we believe DG is now supported through associated policies such as the value of solar and net metering provisions.

Since 2006 when the REST rules were increased, there have also been significant changes in development of solar that supports the expansion of the definition of solar DG. One positive development is the creation of Community Solar. We recommend the Commission expand the definition of DG to include Community Solar. Community solar is an option for customers who are unable to participate in the rooftop solar market, such as low-income customers, renters, and those with poor solar resource access. In general, DG should not be confined to "on-site" installations; off-site renewable energy generation is an important alternative for many customers, and in many cases, may be more cost-effective than on-site solar. We suggest a possible definition for Community Solar, below:

> "Community Solar" means a solar electric generation facility that is located in or near a community served by a qualifying retail utility where the beneficial use of the electricity generated by the facility belongs to the subscribers to the community solar facility. There shall be at least ten subscribers. The owner of the community solar facility may be the qualifying retail utility or any other for-profit or nonprofit entity or organization, including a subscriber organization that contracts to sell the output from the community solar facility to the qualifying retail utility. A community solar facility shall be deemed to be located on the site of customer facilities.

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[26] New Mexico Senate Bill 489, Section 3, available at https://www.nmlegis.gov/Legislation/Legislation?Chamber=S&LegType=B&LegNo=489&year=19

Finally, it is necessary to address the issue of how to treat RECs from non-incented DG installations. After the utilities stopped providing incentives for DG resources, the RECs associated with those non-incented installations stopped being transferred to the utilities. If the RECs are not transferred, then the utilities cannot count the RECs produced by those installations toward compliance with the REST's DG requirement because they do not own them. As a result, APS, TEP, and UNS Electric, Inc. (UNS) have requested waivers for the residential DG requirement in A.A.C. R14-2-1805 for 2019.[27] We look forward to working with the Commission and stakeholders on this issue to develop an administratively simple and low-cost, market-based method for continued acquisition of RECs to avoid double counting and to maintain the integrity of the REST.

Conclusion

The EPS and REST standards encouraged utilities to add increasing amounts of renewable energy to their systems, which have result in myriad benefits for customers and the electric system. The investments made by Arizona utilities on behalf of their ratepayers has contributed to cost reductions in wind and solar. As wind and solar are now the lowest cost resources available to electric utilities, increasing the REST will ensure Arizona utilities' customers have the opportunity to see the cost reductions – and environmental and public health benefits – seen by other utilities. Without a requirement, the Commission cannot ensure that utilities will adopt renewable energy as quickly as possible.

We look forward to working with Commissioners, staff, and other stakeholders on expanding and modernizing Arizona's REST rules.

Sincerely,

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[27] *See* APS's Application for Approval of 2019 RES Implementation Plan, http://docket.images.azcc.gov/0000189966.pdf;
TEP's Application for Approval of 2019 RES Implementation Plan, http://docket.images.azcc.gov/0000189953.pdf; and
UNS's Application for Approval of 2019 RES Implementation Plan http://docket.images.azcc.gov/0000189965.pdf.